

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

EAGLE HARBOR HOLDINGS, LLC, and
MEDIUSTECH, LLC,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:11-CV-05503-BHS

**DECLARATION OF ALEXANDRA
AMRHEIN IN SUPPORT OF
DEFENDANT FORD MOTOR
COMPANY'S RENEWED MOTION
TO LIMIT THE NUMBER OF
ASSERTED CLAIMS**

I, Alexandra Amrhein, declare as follows:

1. I am a Senior Associate at the law firm Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, Massachusetts, 02109. I am one of the attorneys responsible for the representation of Defendant Ford Motor Company ("Ford") in the above-captioned matter.

2. Attached to this declaration as **Exhibit 1** is a true and correct copy of an email from Floyd Short, counsel for Plaintiffs, to Sarah Petty, counsel for Ford, on October 5, 2012.

3. Attached to this declaration as **Exhibit 2** is a true and correct copy of a letter sent from Floyd Short, counsel for Plaintiffs, to Cosmin Maier, counsel for Ford, on March 8, 2013.

1 4. Attached to this declaration as ***Exhibit 3*** is a true and correct copy of a letter
2 sent from Michael Summersgill, counsel for Ford, to Floyd Short, counsel for Plaintiffs, on
3 August 5, 2013.

4 5. Attached to this declaration as ***Exhibit 4*** is a true and correct copy of emails
5 between Floyd Short, counsel for Plaintiffs, and Michael Summersgill, counsel for Ford, on
6 August 9, 2013.

7 6. Attached to this declaration as ***Exhibit 5*** is a true and correct copy of a letter
8 sent from Michael Summersgill, counsel for Ford, to Floyd Short, counsel for Plaintiffs, on
9 September 10, 2013.

10 7. Attached to this declaration as ***Exhibit 6*** is a true and correct copy of an email
11 sent from Floyd Short, counsel for Plaintiffs, to Michael Summersgill, counsel for Ford, on
12 September 11, 2013.

13 8. Attached to this declaration as ***Exhibit 7*** is a true and correct copy of a letter
14 sent from Michael Summersgill, counsel for Ford, to Floyd Short, counsel for Plaintiffs, on
15 September 17, 2013.

16 9. Attached to this declaration as ***Exhibit 8*** is a true and correct copy of *Broadcom*
17 *Corp. v. Emulex Corp.*, No. 8:09-cv-01058, Dkt. No 167 (C.D. Cal. June 30, 2010).

18 10. Attached to this declaration as ***Exhibit 9*** is a true and correct copy of *Intellectual*
19 *Ventures I, LLC, v. Checkpoint Software Tech. Ltd., et al.*, No. 1:10-cv-01067, Dkt. No. 162 (D.
20 Del. Nov. 3, 2011).

21 11. Attached to this declaration as ***Exhibit 10*** is a true and correct copy of
22 *NuVasive, Inc. v. Globus Medical, Inc.*, no. 1:10-cv-849-LPS, Dkt. 99 (D. Del. Nov. 23, 2011).

23 12. Attached to this declaration as ***Exhibits 11A –C*** are true and correct copies of
24 *TALTech Ltd. v. Esquel Enterprises Ltd.*, no. 2:04-cv-00974-TSZ, Dkt. Nos. 167, 169 and 173
25 (W.D. Wash. 2006).

Executed on this 10th day of October, 2013.

/s/ Alexandra Amrhein
Alexandra Amrhein

CERTIFICATE OF SERVICE

I certify that this pleading was filed electronically with the Court and thus served simultaneously upon all counsel of record, this 10th day of October, 2013.

/s/ Duncan E. Manville
Duncan E. Manville